

Brian H. Denker-Youngs
25 Boerum Street Apt 18E
Brooklyn, NY 11206
Tel. 917.373.5019

Presentment Date 1/7/16 12pm
Objections due 1/15/16 5pm

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

X

In re:

BRIAN H. DENKER-YOUNGS

Chapter 7

Debtor

Case Number 15-41069

X

DEBTOR'S MOTION BY PRESENTMENT

TO EXTEND TIME TO OBJECT TO DISCHARGE / DISCHARGEABILITY

PLEASE TAKE NOTICE, that Brian Denker (the "Debtor"), will present the annexed motion and proposed order granting the motion of the Debtor to **EXTEND TIME TO OBJECT TO DISCHARGE / DISCHARGEABILITY** pursuant to Federal Rule of Bankruptcy Procedure 4004(b) and 9006(b)(1)(1), to Honorable Carla E. Craig, Chief United States Bankruptcy Judge, by filing the motion with the court located at the United States Bankruptcy Court, 271 Cadman Plaza East, Room 3529, Brooklyn, New York 11201, on January 7, 2016 at 12:00 Noon (the "Presentment Date").

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the annexed Order must be made in writing and shall be filed with the Clerk of the Court, with a copy delivered to the Chambers of the Honorable Carla E. Craig, Chief United States Bankruptcy Judge, in her Chambers located at the United States Bankruptcy Court, 271 Cadman Plaza East, Room 3529, Brooklyn, New York 11201 and served upon the Debtor, Trustee Ronald McCormick and the Office of the United States Trustee, 271 Cadman Plaza East, Brooklyn, New York 11201, in order that

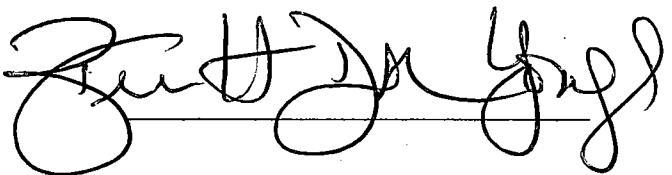
U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK
12/28/2015

they be received in hand by no later than 5:00 p.m., on January 5, 2016.

PLEASE TAKE FURTHER NOTICE, that unless timely objections are filed, the Order may be approved and entered by the Bankruptcy Court without a hearing.

PLEASE TAKE FURTHER NOTICE, that if objections are timely filed and served, or if the Court so directs, a hearing will be held before the Honorable Carla E. Craig in her Courtroom on a date to be determined.

Respectfully Submitted,



Date: December 27, 2015

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25 Boerum Street #18E
Brooklyn, NY 11206

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TO EXTEND TIME TO OBJECT TO DISCHARGE / DISCHARGEABILITY**

COMES NOW, BRIAN H. DENKER-YOUNGS, debtor in the above captioned case for this Motion to Extend Time to Object to Discharge / Discharge ability, states herein under penalty of perjury

- 1: Brian H. Denker-Youngs ('Debtor') through counsel at the time Lawrence Morrison of Morrison and Tennenbaum, PLLC ('Counsel') filed a Voluntary Petition for Relief under Chapter 11 of the United States Bankruptcy Code, 11 U.S.C. on March 13, 2015.
2. Although disputed by the debtor and currently a hearing on the matter is set down for January 13, 2016 before the honorable court, said case was converted to a Chapter 7 on October 1, 2015.
3. Ronald McCord ("Trustee") was appointed as trustee to the bankruptcy estate of Brian H. Denker-Youngs on October 2, 2015.
4. Under Chapter 7, the 341 meeting of creditors initially held on November 12, 2015 was adjourned for a rescheduling by the Trustee himself for January 13, 2016.

5. Over the course of several weeks, debtor has put forward several motions and disputes of material facts directly related to and impacting the debtor and the bankruptcy estate herein and which remain outstanding and before the court; many of which are scheduled for a hearing on January 13, 2016 and some pertinent to proceedings within the state court to which at present allegations of fraud having been committed upon the court have been waged by the debtor and filed with several local and federal enforcement agencies.

6. As such, debtor respectfully puts forward that he does not wish to have his rights waived or excluded or that of any other potential interested party hereto for filing an objection in the case herein however while matters remain still in an initial stage and determinations including that of the actual conversion (which may in-fact be vacated) , as it pertains to the denial of the Debtor's discharge or the discharge ability of any debts in this matter, your deponent feels strongly that the deadline to which is presently set to January 11, 2016 is too premature of a date with so many outstanding and remaining open ended issues and sizable amounts of debt upward and nearing \$125,000 which amounts for at least 60% of the total debt owed if not more.

7. Federal Rule of Bankruptcy Procedure 4004(b) and 9006(b)(1)(1) permits this Court to extend the time for the filing of a complaint to determine discharge for cause, upon request, as ~~150~~22 long as that request is filed before the expiration of the time period allotted for the filing of a complaint regarding discharge or determine discharge ability of debts under 11 U.S.C. § 523. 7. The time period for the filing of a complaint objecting to discharge has not expired as of the date and time of the filing of this Motion.

8. This case is complicated and the potential of many open ended and some very serious allegations that are being unraveled as such your deponent respectfully requests that the date for objections to discharge ability be extended by at least 120-days from the present date objections

are due for all individuals and entities identified herein with the understanding that further extensions may be required.

WHEREFORE, Brian H. Denker-Youngs, the debtor herein, requests that this honorable Court extend the deadline for all creditors and other parties in interest to object to the Debtor's discharge and discharge ability herein through May 11, 2016 and grant such other and further relief as this Court may deem just and proper.

Date: December 27, 2015

Respectfully Submitted,

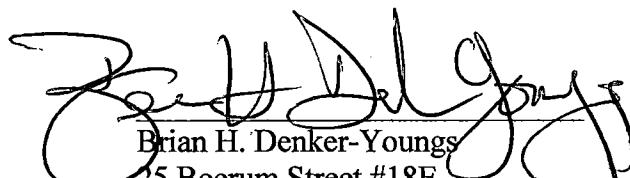


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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by electronic service to those agreeing to receive service of the same and to other parties indicated below by United States Post Office First-Class Mail including the United States Trustee, and to the Chambers of the Honorable Carla E. Craig and upon Trustee McCord, Jaqulyn Loftin, Esq. counsel to the non-debtor spouse and onto the non-debtor spouse himself, Edward John Denker-Youngs.

Date: December 27, 2015



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ORDER TO EXTEND TIME TO OBJECT TO DISCHARGE / DISCHARGEABILITY

Upon review of the debtors' motion by presentment brought before the court on January 7, 2016 at 12noon before the honorable court seeking an Order to Extend Time to Object to Discharge / Dischargeability pending the determination and outcome of several matters before the state and court herein directly related to the debtor's obligations, liabilities and preceding herein, it is so Ordered that debtor's motion for an extension on time to file objections to discharge / dischargeability is hereby granted.

January 7, 2016

Honorable Justice Carla E. Craig